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May 31, 2022

**Via ECF and E-mail to CronanNYSDChambers@nysd.uscourts.gov**

Hon. John P. Cronan, U.S.D.J.  
Danial Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 12D  
New York, NY 10007-1312

Re: Medmarc Casualty Insurance Co. v. Clark & Gentry, PLLC, et al.  
Civil Action No. 1:21-cv-07224 (JPC)

Your Honor,

This firm represents defendants/third-party plaintiffs Clark & Gentry, PLLC, Edgar C. Gentry, Jr., Celia R. Clark, and the Law Offices of Celia R. Clark, PLLC (“Predecessor Firm”) (collectively, “C&G”).

I write to respectfully request a short adjournment of the deadlines set in entry no. 97 on the docket to make a motion to dismiss Third-Party Defendants’ affirmative defenses and Third-Party Defendants, Murray, Shoen & Homer, Inc., Ridge Street Advisors, Inc., BNC Insurance Agency, Inc., and Robert Homer’s (BNC/Homer), counterclaims and affirmative defenses currently scheduled for June 1 to June 10, 2022 on consent on the basis set forth in docket no. 93 and 96. It was not possible due to the holiday weekend for me to obtain consent and ask for the adjournment until today.

The basis for the adjournment is our firm had a new case unexpectedly appear on the trial calendar for jury selection, and all attorneys were either involved in the trial preparation or had to cover Court ordered depositions and other matters for those attorneys preparing for trial. I spoke with counsel for Third-party Defendants, BNC/Homer, Howard Steven Kronberg, whose clients made the counterclaims and who plans to oppose the motion, and he agreed to the schedule as set forth below, which allows him enough time to respond due to a busy period for him at his office.

We have the consent of all parties to the main and Third-Party Action and have worked out a new briefing schedule, with Your Honor’s permission and request Your Honor So-Order the following briefing schedule:

- Deadline to make motion to dismiss the counterclaims and affirmative defenses of the respective Third-Party Defendants, June 10, 2022
- Deadline to oppose the motion July 1, 2022


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- Deadline to reply to the opposition July 15, 2022.

This is the first request to adjourn the briefing schedule So Ordered by Your Honor. We do not anticipate this schedule otherwise impacting the paper discovery and deposition schedule, which remains ongoing and for which the parties are in communication.

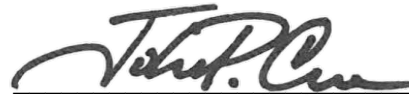
Very truly yours,  
SCHWARTZ, CONROY & HACK, P.C.

  
By: Robert E. Hewitt, Esq.

C&G's unopposed request is granted. C&G shall file their motion to dismiss by June 10, 2022; BNC's opposition is due by July 1, 2022; C&G's reply, if any, is due by July 15, 2022.

SO ORDERED.

Date: June 1, 2022  
New York, New York

  
JOHN P. CRONAN  
United States District Judge